

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Elahe Houshmand

GENERAL INFORMATION:

Name:	Intertape Polymer Group
Address:	2000 Enterprise Drive Richmond, Kentucky 40475
Date application received:	7/1/2005
SIC Code/SIC description:	2671, Packaging Paper and Plastics Film, Coated and Laminated (single-web and multi-web plastics packaging film and sheet)
Source ID:	21-151-00052
Source A.I. #:	2827
Activity ID:	APE20050003
Permit:	V-07-012

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input checked="" type="checkbox"/> Title V
__Minor	<input checked="" type="checkbox"/> Synthetic minor
__Significant	<input type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input checked="" type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input checked="" type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input checked="" type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☒ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☒ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

RENEWAL PERMIT EMISSIONS SUMMARY:

Pollutant	TEMPO 2006 Actual (TPY)	Potential (TPY)	Allowable (TPY)
PM	1.18	47.5	47.5
PM ₁₀	1.18	32.5	32.5
SO ₂	0.009	0.131	0.131
NO _x	1.46	21.9	21.9
CO	1.23	18.4	18.4
Cr	0.042	0.042	0.042
Mn	0.031	0.031	0.031
Ni	0.0045	0.0045	0.0045
VOC	93.6	460	<u>SEE EMISSIONS AND OPERATING CAPS DESCRIPTIONS</u>
Toluene (Single HAP > 9.0 TPY)	93	400	
Combined HAPs > 22.5 TPY	93	411	

SOURCE DESCRIPTION:

Intertape Polymer Group (IPG) has submitted a Title V construction / operating renewal permit application to the Division for Air Quality. For more details, please see the Statement of Permit.

Intertape Polymer Group (IPG) makes pressure sensitive tape by coating paper and film (SIC 2671). The source is located in Madison County that is classified as an ozone attainment area pursuant to Regulation 401 KAR 51:010. IPG is a major source for HAP and VOC. However, the source has voluntarily accepted a facility wide VOC limit of 225 tons per year to avoid applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality, requirements. Currently the facility operates under permit # V-00-044 that was issued in December 2000. The V-00-044 permit authorized IPG to construct / operate web coating Line 2 and to operate web coating Lines 1, 3 and 4. However, IPG did not construct Line 2 within the allowable construction time frame of eighteen (18) months after issuance of the final permit# V-00-044. As a result with this renewal application, the source requested the authorization to construct / operate Line 2.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

The web coating lines are regulated under State Regulation 401 KAR 59:210, NSPS Regulation 40 CFR Part 60 Subpart RR, MACT Regulation 40 CFR Part 63 Subpart JJJJ and to avoid applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality, the source has voluntarily accepted a facility wide VOC limit of 225 tons per year. Emission limitations range from daily average limits on VOC emissions from the applicable State regulation to 12-month rolling total emissions limitation taken as a Synthetic Minor limitation.

It is important to note that the VOC emissions limitations of State Regulation and NSPS Regulation apply to each web coating line individually. On the other hand the HAP emissions limitations of MACT regulation applies to the collection of web coating lines at the facility versus line by line.

A. 401 KAR 59:210 Emission Limitations:

Line 1, Line 2, and Line 3

The permittee shall demonstrate compliance with 401 KAR 59:210 by following either of these requirements:

- (1) As per Section 6(1) of 401 KAR 59:210, any affected facility coating fabric or paper shall be exempt from Section 3 of this administrative regulation if the VOC content of coatings delivered to the applicators on the coating line is less than 2.9 lbs/gal, excluding water and exempt solvent; or
- (2) Section 3 of 401 KAR 59:210 allows for compliance (Alternate Operating Scenario # 1) through achievement of the total VOCs input daily into the coating line (including mixing, storage, and clean-up) control efficiency of at least 85%.

B. 40 CFR Part 60 Subpart RR Emission Limitations:

Line 1 and Line 2

Monthly average limits on VOC emissions resulting from applicability of 40 CFR Part 60 Subpart RR applies to each web coating line:

- (1) 40 CFR 60.442(a)(1) requires VOC emissions from the line applicators, flashoff areas, and ovens to be no more than 0.20 lbs/lb of coating solids applied on the line on a weighted average basis for each calendar month; or
- (2) 40 CFR 60.442(a)(2)(i) allows for compliance (Alternate Operating Scenario # 2) through achievement of an overall VOC reduction from the line applicators, flashoff areas, and ovens of at least 90% as calculated over a calendar month.

Line 3

- (3) The maximum input amount of solvent used on Line 3 under any operating scenario is less than 45Mg (50 tons) per 12 month period. Therefore, this affected facility (Line 3) is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of this subpart. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of this subpart.

C. 40 CFR Part 63 Subpart JJJJ Emission Limitations:

Monthly average limit on HAP emissions resulting from applicability of 40 CFR Part 63 Subpart JJJJ applies to a collection of all web coating lines (Lines 1, 2, and 3) at the facility. The permittee must limit organic HAP emissions to the level specified in paragraph 63.3320 (b)(1), (2), or (3).

- (1) No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or
- (2) No more than 4 percent of the mass of coating materials applied for each month at existing affected sources; or
- (3) No more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

D. Synthetic Minor Emission Limitations:

The 12-month rolling total VOC emissions limitation of 225 tons taken as a Synthetic Minor limitation applies to the entire source.

OPERATIONAL FLEXIBILITY:

Operational flexibility is built into the applicable 401 KAR 59:210 and 40 CFR 60 Subpart RR.